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United States of America  
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IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

11 UNITED STATES OF AMERICA,  
12 Plaintiff,  
13 v.  
14 MARIO GONZALEZ,  
15 Defendant.

CASE NO. 2:20-CR-00013 WBS  
STIPULATION AND ORDER TO CONTINUE  
JUDGMENT AND SENTENCING HEARING AND  
MODIFY PRESENTENCE SCHEDULE  
DATE: February 26, 2024  
TIME: 9:00 a.m.  
COURT: Hon. William B. Shubb

16  
17 STIPULATION

18 Plaintiff United States of America, by and through its counsel of record, and defendant, by and  
19 through defendant's counsel of record, hereby stipulate as follows:

20 1. By previous order, this matter was set for judgment and sentencing on February 26, 2024.  
21 2. By this stipulation, the parties now move to continue the judgment and sentencing  
22 hearing until May 6, 2024 at 9:00 a.m. The parties understand that this date is available to the Court for  
23 a continued judgment and sentencing hearing.  
24 3. The assigned probation officer is working to complete the presentence investigation  
25 process, and an extended timeline for the presentence report is necessary. Moreover, the parties desire  
26 additional time to conduct investigation of matters that may be relevant to sentencing.

27 4. It is therefore requested that the PSR and judgment and sentencing schedule be modified  
28 as follows:

- a) Proposed Presentence Report Due: April 1, 2024
- b) Written Objections to Presentence Report Due: April 8, 2024
- c) Presentence Report Due: April 15, 2024
- d) Motion for Correction of Presentence Report Due: April 22, 2024
- e) Reply or Statement Due: April 29, 2024
- f) Judgment and Sentencing: May 6, 2024, 9:00 a.m.

## IT IS SO STIPULATED.

Dated: February 21, 2024

PHILLIP A. TALBERT  
United States Attorney

/s/ EMILY G. SAUVAGEAU

EMILY G. SAUVAGEAU  
JAMES R. CONOLLY  
Assistant United States Attorneys

Dated: February 21, 2024

/s/ TAMARA SOLOMAN  
TAMARA SOLOMAN  
Counsel for Defendant  
MARIO GONZALEZ

## ORDER

## IT IS SO FOUND AND ORDERED.

Dated: February 21, 2024

WILLIAM B. SHUBB  
UNITED STATES DISTRICT JUDGE